

SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE
DOCKET No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE ADVERTISING MAIL MARKETING ASSOCIATION WITNESS SCHICK
(USPS/AMMA-T1-2)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the *Special Rules of Practice*, the United States Postal Service directs the following interrogatories and requests for production of documents to the Advertising Mail Marketing Association witness Schick: USPS/AMMA-T1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Kenneth N. Hollies

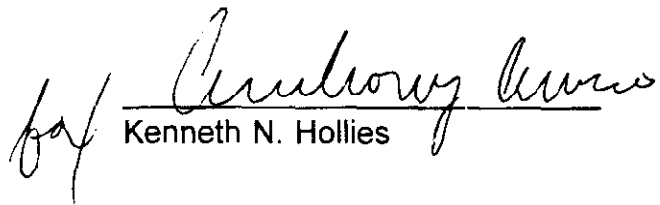
475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
January 28, 1998

AMMA/USPS-T1-2. Please see your testimony at page 6, line 19, through page 7, line 3, where you recommend that, at the very least, the rates advanced by AMMA witness Andrew be adopted.

- a. Is it your understanding that witness Andrew's proposal would decrease the current differential between the per piece discounts for DBMC and DSCF from 0.5 cent per piece to 0.4 cent per piece? If that is not your understanding, please explain.
- b. Is it your understanding that witness Andrew's proposal would result in an increase (versus the Postal Service proposed rates) of $\frac{1}{2}$ cent per piece for non-destination entry, piece-rated ECR pieces? If that is not your understanding, please explain.
- c. Is it your understanding that witness Andrew's proposal would result in an increase (versus the Postal Service proposed rates) of $\frac{1}{10^{\text{th}}}$ of one cent for DBMC-entered piece-rated ECR pieces? If that is not your understanding, please explain.
- d. Is it your understanding that witness Andrew's proposal would result in no change (versus the Postal Service proposed rates) for DSCF- or DDU-entered piece-rated ECR pieces? If that is not your understanding, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Kenneth N. Hollies

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